Mark G. Ledwin, Esq. (ML-6873) WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 3 Gannett Drive White Plains, NY 10604

Tel: (914) 872-7148 Fax: (914) 323-7001

E-Mail: mark.ledwin@wilsonelser.com

Attorneys for Creditor/Equipment Lessor Relational Technology Solutions

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
	:	Chapter 11
In re:	:	
	:	Case No. 09-50026-REG
GENERAL MOTORS CORP., et al.,	:	
	:	Jointly Administered
Debtors.	:	•
	:	
	x	

NOTICE OF PARTIAL WITHDRAWL OF OBJECTION BY RELATIONAL TECHNOLOGY SOLUTIONS TO DEBTORS' NOTICE OF (I) INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES OF PERSONAL PROPERTY, AND (II) CURE AMOUNTS RELATED THERETO

PLEASE TAKE NOTICE, that Relational, LLC, f/k/a Relational Funding Corporation, and d/b/a Relational Technology Solutions ("RTS"), a creditor and party in interest herein, by and through its undersigned attorneys, hereby withdraws that portion of its Objection [Docket No. 1340] to the Debtors' Notice dated June 5, 2009, of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts and Unexpired Leases of Personal Property, and (ii) Cure Amounts related thereto (the "Objection"), solely with respect to the "Direct RTS Leases" and the "RTS/EDS Leases" as more fully identified in the Objection.

PLEASE TAKE FURTHER NOTICE, that the forgoing Partial Withdrawal is based

upon a proposed resolution with Debtors of the issues raised by RTS in the Objection with

respect to the "Direct RTS Leases" and the "RTS/EDS Leases" and thus is subject to and

conditioned upon appropriate documentation and court approval, and otherwise is without

prejudice.

PLEASE TAKE FURTHER NOTICE, that RTS continues to maintain its Objection

with respect to the "RTS/Pac Rim Leases" as more fully identified in the Objection.

Dated: White Plains, New York

July 6, 2009

WILSON, ELSER, MOSKOWITZ, **EDELMAN & DICKER LLP** 

By: /s/ Mark G. Ledwin

Mark G. Ledwin, Esq. (ML-6873)

3 Gannett Drive

White Plains, NY 10604

Tel: (914) 872-7148

Fax: (914) 323-7001

E-Mail: mark.ledwin@wilsonelser.com

Attorneys for Creditor/Equipment Lessor

**Relational Technology Solutions** 

09-50026-mg Doc 2986 Filed 07/06/09 Entered 07/06/09 15:45:02 Main Document Pg 3 of 5

**CERTIFICATE OF SERVICE** 

Mark G. Ledwin, an attorney duly admitted to practice before this Court, hereby certifies

that on the 6th day of July, 2009, I caused true and correct copies of the foregoing Objection to

be served via Fed Ex overnight delivery service on each of the parties listed on the annexed

Service List and via the Court's ECF system on all other interested parties.

Dated: White Plains, New York

July 6, 2009

/s/ Mark G. Ledwin

Mark G. Ledwin, Esq. (ML-6873)

- 3 -

## **SERVICE LIST**

General Motors Corporation
Cadillac Building
30009 Van Dyke Avenue
Warren, Michigan 48090-9025
Attn: Warren Command Center
Mailcode 480-206-114

Weil, Gotshal & Manges LLP
Attorneys for the Debtors
767 Fifth Avenue
New York, New York 10153
Attn: Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq.

U.S. Treasury 1500 Pennsylvania Avenue NW Room 2312 Washington, DC 20220 Attn: Matthew Feldman, Esq.

Cadwalader, Wickerham & Taft LLP Attorneys for the Purchaser One World Financial Center New York, New York 10281 Attn: John J. Rapisardi, Esq.

Kramer Levin Naftalis & Frankel LLP Attorneys for the Creditors Committee 1177 Avenue of the Americas New York, New York 10036 Attn: Thomas Moers Mayer, Esq. Kenneth H. Eckstein, Esq. Gordon Z. Novod, Esq.

Vedder Price, P.C.
Attorneys for Export Development Canada
1633 Broadway, 47<sup>th</sup> Floor
New York, New York 10019
Attn: Michael J. Edelman, Esq.
Michael L. Schein, Esq.

Office of the U.S. Trustee for the Southern District of New York 33 Whitehall Street, 21<sup>st</sup> Floor New York, New York 10004 Attn: Diana G. Adams, Esq.